# UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF NORTH CAROLINA GREENVILLE DIVISION

IN RE:	)	
	)	Case No. 19-00730-5-JNC
CAH ACQUISITION COMPANY #1,	)	
LLC, d/b/a WASHINGTON COUNTY	)	Chapter 11
HOSPITAL,	)	_
	)	
Debtor.	)	
	)	

#### **APPLICATION FOR EXTENSION OF TIME**

COMES NOW, Thomas W. Waldrep, Jr. (the "Trustee") herein, by and through his undersigned counsel of record, and hereby moves this Court for an Order allowing the Trustee an extension of time within which to file the November monthly report and, in support of said Application shows unto the Court as follows:

- 1. An involuntary petition for relief under Chapter 7 of the United States Bankruptcy Code was filed on behalf of the Debtor on February 19, 2019. Thomas Waldrep was appointed as Trustee for the Debtor on February 22, 2019.
- 2. The Debtor filed a Motion to Convert the Involuntary Chapter 7 Case to a Chapter 11 case on March 14, 2019, and the Motion was approved on March 15, 2019.
  - 3. The Trustee needs additional time to complete the November monthly report.
- 4 Based on the foregoing, the Trustee requests an extension of time up to and including January 10, 2020 to file the November monthly report.

WHEREFORE, the Trustee prays that he be granted an extension of time up to and including January 10, 2020, within which to complete and file the November monthly report.

#### This the 31st day of December, 2019. WALDREP LLP

### /s/ Thomas W. Waldrep, Jr.

Thomas W. Waldrep, Jr. (N.C. State Bar No. 11135) James C. Lanik (N.C. State Bar No. 30454) John R. Van Swearingen (N.C. State Bar No. 53646) 101 S. Stratford Road, Suite 210 Winston-Salem, NC 27104

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- and -

### HENDREN, REDWINE & MALONE, PLLC

# /s/ Jason L. Hendren

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Co-Counsel for the Trustee

### **CERTIFICATE OF SERVICE**

I, Jason L. Hendren, 4600 Marriott Drive, Suite 150, Raleigh, North Carolina 27612, certify:

That I am, at all times hereinafter mentioned, was, more than eighteen (18) years of age;

That on 31<sup>st</sup> day of December, 2019, I served copies of the foregoing pleading on the parties listed below by depositing a copy of the same in the United States mail bearing sufficient postage.

Dated: December 31, 2019 WALDREP LLP

/s/ Thomas W. Waldrep, Jr.

Thomas W. Waldrep, Jr. (N.C. State Bar No. 11135) James C. Lanik (N.C. State Bar No. 30454) John R. Van Swearingen (N.C. State Bar No. 53646) 101 S. Stratford Road, Suite 210 Winston-Salem, NC 27104

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Co-Counsel for the Trustee

TO:

Kirstin Gardner
Office of the Bankruptcy Administrator

(via CM/ECF)